

FILED
DISTRICT COURT OF GUAM

AUG 28 2007

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Clerk of Court

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UNITED STATES DISTRICT COURT

TERRITORY OF GUAM

U.S. EQUAL EMPLOYMENT)	CIVIL CASE NO. <u>06-00028</u>
OPPORTUNITY COMMISSION,)	
)	
Plaintiff,)	NOTICE OF LODGING OF
)	ORIGINAL SIGNATURE
vs.)	
)	
LEO PALACE RESORT,)	
)	
Defendant.)	

ORIGINAL

1 COMES NOW the United States and lodges with the Court, the original signature, of the
2 government's Declaration of Angela Morrison in Support of Plaintiff EEOC's Opposition to
3 Defendant's Alternative {Motion} to Dismiss Emotional Distress Claims; Motion to Extend
4 Discovery Completion Deadline; and Motion for Independent medical Examination in the above-
5 captioned matter, a facsimile copy of which was previously filed on August 14, 2007.
6

7 Respectfully submitted this 28th day of August, 2007.
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9

10 LEONARDO M. RAPADAS
11 United States Attorney
12 Districts of Guam and NMI

13 By: 

14 MIKEL W. SCHWAB
15 Assistant U.S. Attorney
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20 **UNITED STATES DISTRICT COURT**

21 **DISTRICT OF GUAM**

22 U.S. EQUAL EMPLOYMENT
23 OPPORTUNITY COMMISSION,

24 Plaintiff,

25 v.

26 LEO PALACE RESORT,

27 Defendant.

28 JENNIFER HOLBROOK; VIVIENE
VILLANUEVA; and ROSEMARIE
TAIMANGLO,

Plaintiff-Intervenors,

v.

MDI GUAM CORPORATION d/b/a LEO
PALACE RESORT MANENGON
HILLS and DOES 1 through 10,

Defendants.

Case No.: 2:06-CV-00028

DECLARATION OF ANGELA
MORRISON IN SUPPORT OF
PLAINTIFF EEOC'S OPPOSITION
TO DEFENDANT'S ALTERNATIVE
[MOTION] TO DISMISS
EMOTIONAL DISTRESS CLAIMS;
MOTION TO EXTEND DISCOVERY
COMPLETION DEADLINE; AND
MOTION FOR INDEPENDENT
MEDICAL EXAMINATION

1 I, Angela D. Morrison, declare and state:

2 1. I am a Trial Attorney employed at the Las Vegas Local Office, Los Angeles
3 District Office of the United States Equal Employment Opportunity Commission. I have
4 personal knowledge of the facts stated herein, and if called as a witness to testify as to the
5 matters stated herein, I could and would competently do so.
6

7 2. Attached hereto as Exhibit 1 is a true and correct copy of Plaintiff EEOC's
8 Response to Defendant Leo Palace Resort's First Request for Production of Documents
9 to Plaintiff and of Plaintiff-Intervenors' Responses to Defendant's First Request for
10 Production of Documents.
11

12 3. Counsel for Defendant took the depositions of Jennifer Holbrook on March 17,
13 2007, Viviene Villanueva on March 21, 2007, and Rosemarie Taimanglo on March 22,
14 2007; which depositions I attended.
15

16 4. Attached hereto as Exhibit 2 is a true and correct copy of a Letter dated March
17 21, 2007 from Attorney Phil Torres, counsel for Plaintiff-Intervenors, to Attorney Tim
18 Roberts, counsel for Leo Palace Resort. The letter had attached to it the medical
19 summary reports referenced within the letter but I have not attached them hereto, to
20 protect the privacy of Plaintiff-Intervenors.
21
22

23 5. On July 30, 2007, Counsel for Defendant took the depositions of Dr. Lilli
24 Perez-Iyechad and Dr. Tom Babauta, which depositions I attended.
25

26 6. EEOC has never received notice of Defendant's request for Independent
27 Medical Examination of Plaintiff-Intervenors specifying the time, place, manner,
28

1 conditions, and scope of the examination, and the person or persons by whom its to be
2 made.

3 I declare under penalty of perjury that the foregoing is true and correct. Executed
4 this 10th day of August, 2007, at Las Vegas, Nevada.
5

6
7 
8 Angela D. Morrison